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Attorneys for Defendant  
PrO Unlimited, Inc.

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA - SAN JOSE DIVISION

MICHAEL LAZARIN, STEPHEN KOHLER,  
and PAUL CAPANO, individually and on  
behalf of other members of the general public  
similarly situated, and as aggrieved employees  
pursuant to the Private Attorneys General Act  
("PAGA")

Plaintiffs,

v.

PRO UNLIMITED, INC., JUNIPER  
NETWORKS, INC., JUNIPER  
NETWORKS HOLDINGS  
INTERNATIONAL, INC., and JUNIPER  
NETWORKS (US), INC.

Defendants.

Case No. 5:11-CV-03609-HRL

**JOINT STIPULATION TO EXTEND TIME  
FOR RULE 26(f) REPORT, INITIAL  
DISCLOSURES AND CMC CONFERENCE  
AND ~~PROPOSED~~ ORDER**

TO THE HONORABLE COURT AND TO ALL PARTIES AND COUNSEL:

WHEREFORE, pursuant to Federal Rule of Civil Procedure 16(b)(4), and for good cause,  
plaintiffs Michael Lazarin, Stephen Kohler and Paul Capano ("Plaintiffs"), and defendants PrO  
Unlimited, Inc. ("PrO"), Juniper Networks, Inc., Juniper Network Holdings International, Inc.,  
and Juniper Networks (US), Inc., by and through their respective attorneys of record, hereby  
jointly stipulate and request the Court to vacate the dates set forth in the Order granting the Joint  
Stipulation to Extend Time for Filing Rule 26(f) Report, Initial Disclosures, and CMC

Conference, filed on November 23, 2011, and to continue such dates as set forth in the stipulation below.

The parties are continuing to explore early class-wide resolution and have reached a tentative understanding. As a result, the parties respectfully request additional time to focus on final resolution of this case.

WHEREFORE, the parties hereby jointly stipulate and request as follows:

1. The current deadline of January 17, 2012, to file the Rule 26(f) Report, to complete initial disclosures, to state objections in the Rule 26(f) Report, and to file a Case Management Statement, be continued to March 20, 2012;
2. The current deadline of January 17, 2012, to file a joint case management statement, be continued to March 20, 2012; and
3. The Initial Case Management Conference presently set for January 24, 2012, be continued to March 27, 2012.

IT IS SO STIPULATED.

Date: January 18, 2012 RUKIN HYLAND DORIA & TINDALL LLP

By: /s/ [Peter Rukin] as approved on 1/18/12  
Peter Rukin  
Attorneys for Plaintiffs

Date: January 18, 2012 JACKSON LEWIS LLP

By: /s/ [Cary G. Palmer]  
Cary G. Palmer  
Attorneys for Defendant  
PrO Unlimited, Inc.

Date: January 18, 2012 ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP

By: /s/ [Baldwin J. Lee] as approved on 1/18/12  
Baldwin J. Lee  
Attorneys for Defendant  
Juniper Networks, Inc., Juniper Network  
Holdings, International, Inc. and Juniper  
Networks (US), Inc.

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FOR GOOD CAUSE, IT IS HEREBY ORDERED AS FOLLOWS:

1. The current deadline of January 17, 2012, to file the Rule 26(f) Report, to complete initial disclosures, to state objections in the Rule 26(f) Report, and to file a Case Management Statement be continued to March 20, 2012;
2. The current deadline of January 20, 2012, to file a joint case management statement, be continued to March 20, 2012; and
3. The Initial Case Management Conference presently set for January 24, 2012, be continued to March 27, 2012.

Dated: January 19, 2012



HONORABLE HOWARD R. LLOYD  
MAGISTRATE JUDGE OF THE  
UNITED STATES DISTRICT COURT